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Attorney for Plaintiff Alice Chan

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ALICE CHAN Plaintiff, v. INVESTMENT RETRIEVERS, INC. Defendant.	Case No.: C 07 5178 MMC PLAINTIFF'S UNOPPOSED MOTION FOR DISMISSAL WITHOUT PREJUDICE
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Now comes Plaintiff, by and through counsel, pursuant to Federal Rule of Civil Procedure 41(a)(2), and respectfully moves the Court for an Order dismissing the above-captioned case without prejudice. The dismissal of the present action without prejudice is warranted since counsel for the Plaintiff is leaving the law firm of Legal Helpers, P.C. and, at this time, there is no suitable substitution of counsel.

Alternatively, Plaintiff respectfully requests a continuance of the Case Management Conference and an extension of time to comply with the Court's ADR requirements, to allow another attorney of the firm to find local counsel and enter an application to appear in this matter *pro hac vice*.

For the foregoing reasons, Plaintiff respectfully moves the Court to dismiss the action without prejudice or, alternatively, for a continuance to allow another attorney of Legal Helpers, P.C. time to find local counsel and submit an Application to Appear *Pro Hac Vice*.

This Motion is unopposed.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

By: /s/ W. Kirk Moore
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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2007 a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ W. Kirk Moore